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749 Middlesex Turnpike  
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August 11, 2005

Mr. Arthur Neal  
Director  
Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave, S.W.  
Room 4008  
So. Ag. Stop 0268  
Washington, DC 20250

**RE: Docket Number: TM-04-07; Advance notice of proposed rulemaking on  
National Organic Program; Sunset Review**

Dear Mr. Neal:

Welch Foods Inc., A Cooperative ("Welch Foods") appreciates the opportunity to submit comments to the United States Department of Agriculture on the National Organic Program Sunset Review related to the continued use of synthetic and non-synthetic substances on the National List of Allowed and Prohibited Substances for organic agricultural production and handling (70 Federal Register 53177; June 17, 2005). Welch Foods is the world's largest producer of grape juice made from Concord grapes and the world's largest producer of grape juice made from Niagara grapes. Welch Foods currently produces and sells Welch's Organic 100% Grape Juice product.

Welch Foods Inc. submits these comments to request inclusion on the National List of certain processing aids that have long been used in the production of grape juice from Vitis Labruscana grapes (Concord and Niagara varieties). Concord and Niagara grapes are unique as slip skin grapes. The slip skin characteristics of these grapes require specialized processing that is different from the table (Thompson) and wine grapes made into juice. The specialized processing aids are required to allow the grapes to be pressed. The grapes yield a lubricious material, and without these processing aids, the grape will coat the press and not allow the juice to be released from the fruit.



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Page 2

The following processing aids are essential for the production Concord and Niagara grape juice:

- Enzymes – are used for the de-juicing and depectinization of the grapes and for the settling of the grape juice. Enzymes are listed on the National List (205.605(a)). Use of enzymes in organic products is supported by 21 CFR Part 184, 21 CFR Part 173 and by International Organic Regulations of Japan, Codex, and IFOAM.
- Calcium Hydroxide – is used as a processing aid to prevent tartrate crystal precipitation in the final grape juice product. Calcium hydroxide is listed on the National List (205.605(b)). Use of calcium hydroxide is supported by 21 CFR 184.1205, NOSB 4/95, and International Organic Regulations of Japan, Codex and the EU.
- Diatomaceous Earth – is used as a clarifying agent to remove the insoluble solids from the grape pulp. DE is listed on the National List (205.605(a)). Use of DE is supported by International Organic Regulations of Japan, Codex, the EU, Australia and Canada.
- Paper (Wood Pulp) – is a wood cellulose fiber that is dried in sheet forms. These sheet forms (paper) are used as an aid in the separation of seeds, skin and stems from the juice. This processing aid is used industry wide in the production of Concord and Niagara Juice

There are no organic or other alternatives for producing commercial quantities of Concord and Niagara juice without the use of the processing aids listed above.

Thank you for your consideration.

Susan J. Kelley  
Manager of Product Development